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Subject: Exide
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Attachments: [Exide Prelim1.docx](#)

I have attached the HRS Quickscore for Exide, the last page has some assumptions that were made in the score. In addition I would like to point out that this is a quick and dirty based on information from the RCRA files and environmental data on receptors that could be gleaned from the reports and online sources. In addition to this information, I think there are several points worth mentioning-the HRS score is based heavily on an observed release to surface water, and data use to document this release were analyzed for only Pd and Cd, and new sampling would need to be collected, furthermore the TCEQ and Exide have existing VCP agreements on Stewart Creek and Stewart Creek has already been remediated to levels of 91 ppm lead, current releases are below this clean-up level. Sites that are in the VCP program are generally not placed on the NPL due to MOU between EPA and the State. If the site was to be considered for NPL the TCEQ would have to terminate the VCP. See link below.

<http://www.tceq.texas.gov/remediation/sites/exide/exide>

Based on my review it would likely score, with supporting documentation and sampling. I have some policy and general concerns if you would like to discuss them. See attached preliminary scoring document.

P.S. Big thanks to LaDonna and Bret, Rick, Paul James and Gary Miller who pulled everything together .

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<http://www.marrow.org>